James E. Shelton Director, Final Verdict Solutions 316 Covered Bridge Road King of Prussia, PA 19406 (484) 626-3942 James@finalverdictsolutions.com

Assignee of Record in Pro Per

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

JAMES E. SHELTON DBA FINAL
VERDICT SOLUTIONS

Assignee of Record
v.

CAPITAL ADVANCE SOLUTIONS, LLC

Defendant

No. 1:17-mc-00008

Honorable Noel L. Hillman

## **REQUEST FOR SEIZURE ORDER:**

COMES NOW JAMES E. SHELTON DBA FINAL VERDICT SOLUTIONS, Assignee of Record in this matter, and hereby provides the following in support of his Request for Seizure Order:

- Assignee of Record SHELTON ("Assignee") is the judgment creditor in this matter by virtue of an Assignment of Judgment. An assignment executed by the original Plaintiff RYAN ALCORN has been docketed with this Court.
- Defendant CAPITAL ADVANCE SOLUTIONS, LLC has paid \$0.00 towards satisfaction of this judgment, and has failed/refused to satisfy, settle, or mitigate this matter.

- 3. Defendant maintains an office space in the Bayport One building located at 8025 Black Horse Pike, Suite 400, West Atlantic City 08232. The U.S. Marshals served notice of the Writ of Execution upon the Defendant at this location on May 2, 2017.
- 4. According to Defendant's website, www.capitaladvancesolutions.com, Defendants maintain a main office at 1715 State Route 35, Suite 302, Middletown, NJ 07748.
- 5. Assignee requests a Seizure Order to enforce this judgment with the assistance of the U.S. Marshal's Service, ordering the seizure of the Defendant's property and goods in Defendant's office spaces, including telephones, computers, electronics, office supplies and equipment, and any other property owned by the Defendant deemed valuable and contained therein.
- 6. WHEREFORE, Assignee JAMES E. SHELTON DBA FINAL VERDICT SOLUTIONS hereby requests this Honorable Court to enter an Order:
  - a. Authorizing JAMES E. SHELTON, under the supervision and with the assistance of the U.S. Marshal, to take all necessary steps to secure and remove the Defendant's property located at the above addresses, including breaking open, entering and searching for said property and placing it with an appropriate storage facility.
  - b. Ordering that anyone interfering in the execution of this Order by arrested by the United States Marshal and/or his/her representative.
  - c. Ordering JAMES E. SHELTON to account completely for all property seized pursuant to this Order and to compile a written inventory of all such property and to provide a copy to the U.S. Marshal, who shall include such a copy with his return to the court.

d. Ordering JAMES E. SHELTON, on whose behalf the court issues this Order, to act as substitute custodian of any and all property seized pursuant to this Order and shall hold harmless the U.S. Marshals Service and its employees from any and all claims, asserted in any court or tribunal, arising from any acts, incidents, or occurrences in connection with the seizure and possession of the defendant property, including any third-party claims.

e. Ordering that all reasonable costs incurred with the execution of this Order be added to the judgment as taxable costs to the Defendant. Assignee will file a bill of costs with the court detailing all reasonable and necessary expenses actually incurred.

Respectfully Submitted,

Dated: May 8, 2017

James E. Shelton
Director, Final Verdict Solutions
316 Covered Bridge Road
King of Prussia, PA 19406
(484) 626-3942
James@finalverdictsolutions.com

Assignee of Record in Pro Per

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

JAMES E. SHELTON DBA FINAL

No. 1:17-mc-00008

**VERDICT SOLUTIONS** 

Honorable Noel L. Hillman

Assignee of Record

V.

CAPITAL ADVANCE SOLUTIONS, LLC

Defendant

ORDER GRANTING SEIZURE OF DEFENDANT'S PROPERTY:

This matter having come before the Court by JAMES E. SHELTON DBA FINAL VERDICT SOLUTIONS, Assignee of Record in this matter, upon consideration of Assignee's Request for Seizure Order, the Assignee's Request is **GRANTED**.

- a.) IT IS HEREBY ORDERED that **JAMES E. SHELTON**, the party on behalf of whom this Order is being issued, is authorized under the supervision and with the assistance of the U.S. Marshal, to take all necessary steps to secure and remove the following property: telephones, computers, electronics, office supplies and equipment, and any other valuable goods or property located at 8025 Black Horse Pike, Suite 400, West Atlantic City, NJ 08232, and 1715 State Route 35, Suite 302, Middletown, NJ 07748 including breaking open, entering and searching for said property and placing it with an appropriate storage facility; and it is further
- b.) ORDERED that anyone interfering with the execution of this Order is subject to arrest by the United States Marshal and/or his or her representative; and it is further

c.) ORDERED that JAMES E. SHELTON, on whose behalf the court issues this Order,

will account completely for all property seized pursuant to this Order and shall compile

a written inventory of all such property and shall provide a copy to the U.S. Marshal,

who shall include such a copy with his return to the court; and it is further

d.) ORDERED that JAMES E. SHELTON, on whose behalf the court issues this

Order, will act as substitute custodian of any and all property seized pursuant

to this Order and shall hold harmless the U.S. Marshals Service and its employees from

any and all claims, asserted in any court or tribunal, arising from any acts, incidents, or

occurrences in connection with the seizure and possession of the defendant property,

including any third-party claims.

e.) ORDERED that Assignee will recover all reasonable expenses incurred with the

execution of this order from the Defendant as taxable costs to the judgment. Assignee

will file a bill of costs with the Court detailing reasonable costs incurred.

Entered:	

HONORABLE NOEL L. HILLMAN UNITED STATES DISTRICT JUDGE

## **Final Verdict Solutions**

James E. Shelton: Director
316 Covered Bridge Road

King of Prussia, PA 19406 Tel: (484) 626.3942

James@finalverdictsolutions.com

May 8th, 2017

United States District Court for the District of New Jersey Mitchell H. Cohen Building & U.S. Courthouse 4th & Cooper Streets, Room 1050 Camden, NJ 08101

RE: SHELTON v. CAPITAL ADVANCE SOLUTIONS, LLC, No. 1:17-mc-00008

TO THE CLERK OF COURT:

Please file the attached documents in your office, and forward the Request for Seizure Order and Writ of Execution to Judge Hillman for review. When and if Judge Hillman approves the Seizure Order, please forward a Certified copy of the Order & Writ to my office in the enclosed pre-paid envelope I have provided for your convenience.

Thank you. Please do not hesitate to contact me if you have any questions.

Respectfully Submitted,

James C. Shelton

James E. Shelton

Director, Final Verdict Solutions

Assignee of Record